# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v. BHARATH KAKIREDDY, et al. Case No. 19-20026 Hon. Gershwin A. Drain

Defendants.

Timothy P. McDonald (P64562) Attorney for Plaintiff U.S. Attorney's Office 211 W. Fort Street, Suite 2001 Detroit, Michigan 48226 (313) 226-9100

David S. Steingold (P29752) Attorney for Defendant Bharath Kakireddy Law Offices of David S. Steingold 500 Griswold Street, Suite 2320 Detroit, Michigan 48226 (313) 962-0000

### SENTENCING MEMORANDUM

Bharath Kakireddy is a 30-year old native of India. He is single with no children. His parents still live in India, where his father is a farmer and his mother a housewife.

Early on, it was Bharath's dream to come to the United States, earn his degrees, obtain CPT status and, hopefully, find a job where he could be sponsored to obtain, eventually, a green card and a path to citizenship to the United States.

Bharath obtained an undergraduate degree in electrical engineering from Vardhaman University in India. He then obtained a student visa and began working on his Master's at Atlantis University in Miami, Florida. He transferred to Silicon Valley University in California because it was too expensive for him to live in Miami. Bharath Kakireddy comes from a very humble background, and at the time was not able to work to help pay his bills.

Silicon University is one of well over 100 independent colleges accredited by an organization called the Accrediting Counsel for Independent Colleges and Schools ("ACICS") It was recognized by the Department of Education and allowed students, predominantly foreign students, to earn various degrees in the United States, usually with the intention of obtaining work in the United States. In order to do so, you need to have an I-20 Form. That is the paper that grants you status after coming to the United States with a F-1 Visa.

Students often seek OPT, Optional Practical Training. That is temporary employment directly related to an F-1 student's major area of study. Eligible students can apply to receive up to 12 months of OPT employment authorization before completing their academic studies. Students can also obtain post-completion OPT training, however, the periods of pre-completion OPT are deducted from the available period of post-completion OPT.

Pre-completion OPTs can be applied for after a student has been lawfully enrolled on a full-time basis for at least one full academic year at a college, university, conservatory or seminary that has been certified by the U.S. Immigration and Customs Enforcement Student and Exchange Visiting Program to enroll F-1 students.

One can obtain only 36 months of OPT training combined, pre- and post-completion of studies.

CPT is temporary authorization for practical training directly related on to one's major field of study, whether paid or unpaid. That can include employment, internship experience, cooperative education experience or practicum participation. CPT authorization can be part-time, full-time, during the regular academic year (although one

must register for full-time credits), or during an annual vacation quarter. Once 12 months have been accumulated of full-time CPT authorization, eligibility is lost for OPT. Part-time CPT authorization, or fewer than 12 months of full-time CPT authorization, does not affect the OPT eligibility.

To be eligible to apply for CPT, one must be currently in a valid F-1 status, have been enrolled full-time in a college or university for at least one academic year, have declared a major, will earn internship course credits in one's academic department for the CPT experience, will earn one's degree and have a job or internship offer.

Bharath Kakireddy was doing everything correctly when, on December 12, 2016, the Department of Education announced that it no longer recognized the accreditation agency for these schools. After some legal fight of this decision, on December 21, 2016, U.S. District Court Judge Reggie B. Walton denied the ACICS request for a temporary restraining order to stay the decision of the U.S. Department of Education terminating ACICS's status as a federally recognized accrediting agency.

On April 3, 2018, the Secretary of Education issued an Order restoring ACICS's status as a federally recognized agency back to December 12, 2016.

In the interim, approximately 16,000 international students in the United States were affected by the ACICS losing its accreditation. The attached list includes 171 of those schools (Exhibit A).

Options for students who were now faced with losing their legal status in the United States had to either determine whether their school was accredited by another agency, transfer to another accredited school, or depart the United States if either of those options did not work out.

The situation for Bharath Kakireddy and others similarly situated was dire. Unless they were enrolled in an accredited university within 15 days of the termination of the accreditation, they would be out of status.

It was at this point that the University of Farmington increased its web presence in order to attract students who were out of status. Bharath Kakireddy was referred to the University by another individual who informed him that this was a perfect opportunity to maintain status, seek CPT while seeking admission to a different university.

Bharath Kakireddy fell victim to this charade. While it is true that he eventually became aware that the school was not conducting classes nor did they have a standard curriculum, he nevertheless believed that he was legally enrolled in an accredited school. Attached as Exhibit B is the admission package received from the University of Farmington which, as the Court will see, certainly makes a strong case for it being a legitimate option, a stop-gap if you will, for Mr. Kakireddy and others similarly situated. Also included in Exhibit B are emails between Bharath Kakireddy and "Ali Milani," the purported Director of Admission from the University of Farmington. This shows that even after enrolling, Mr. Kakireddy was still asking about details of the course schedule, obviously still under the impression that he was doing nothing wrong.

After enrolling, Mr. Kakireddy was encouraged to refer other students to the University. Others who sought enrollment were ignored until they were "referred" by Mr. Kakireddy.

The Court should know that it is a common practice for some of these colleges to pay a referral fee for recruiting students. It is certainly not unique to the University of Farmington. Having been referred to the University of Farmington by a now co-defendent

who worked out a deal to be paid for referring students, Bharath Kakireddy did the same.

The offer made by the University of Farmington is that once he referred nine students, his tuition would be waived, and he would thereafter be paid \$500 for every student recruited.

Bharath Kakireddy's motivation was not just financial; it was primarily to help disenfranchised fellow countrymen from India who were in the same position as he, seeking to continue their studies and obtain employment in their field of study.

These students as a whole were good, hardworking young men and women, looking to better their lives usually in high tech jobs in the United States. Seeking a part of the American dream, they were desperate to maintain their status, not to commit crimes or take advantage of our liberal welfare system, but to work in areas in which they were highly skilled, trying to find that unique job that would justify their employers seeking to sponsor these students for eventual United States citizenship.

While those dreams are dashed for almost all of these students, this Court should understand that this was not a pay-to-stay scheme, it was a method designed to be a stop-gap while the students were hoping the accreditation decision would be reversed, or they could transfer to another accredited university.

In fact, in January of 2019, Bharath Kakireddy applied for and was accepted to the New England College in New Hampshire. Attached as Exhibit C is the acceptance by New England College, as well as requests from Bharath Kakireddy to the University of Farmington to transfer his student exchange information to the New England College. It was shortly thereafter that this indictment issued and Mr. Kakireddy, along with so many others, were taken into federal custody.

Before that transfer, back in March of 2018, Bharath Kakireddy was offered a full-time position with Deloitte Consulting out of New York City. Exhibit D contains the letter formally offering a job to Bharath Kakireddy. Also attached is a highly redacted intent to deny Deloitte's petition for non-immigrant worker status on behalf of Bharath Kakireddy (I-129). While counsel has still not seen the entirety of this intent to deny, it appears clear from what is written that the denial has to do with the time Mr. Kakireddy spent at the University of Farmington, working under the CPT program, but not at a higher educational level than the previous 12 months when he was working under the CPT. Bharath Kakireddy was certainly educated and qualified to be employed as a solution analyst. His Bachelor's Degree in Electrical Engineering from Vardhaman, his Master's Degree in Computer Science from Silicon Valley University, as well as his practical training, made him an ideal candidate. Instead he is now faced with immediate deportation having pled guilty to conspiracy to commit visa fraud and harbor aliens for profit.

The Government is seeking to hold Mr. Kakireddy to a guideline range of 37-46 months. In order to do so, the computation of students who were "harbored" was listed at more than 100, resulting in an additional three points to the offense level. This enhancement greatly overstates the severity of the offense. This was not a conspiracy where the defendants sat down and determined who they were going to target and how much they were going to make. This was Mr. Kakireddy on his own offering help to his friends who asked for his assistance. In fact, Mr. Kakireddy was paid for recruiting 90 students. As such, he should not have received those three points and his guideline range should be 27-33 months.

The immigration laws provide that if a person such as Bharath Kakireddy is removed from the country because of his conviction of a serious felony, he would not be eligible to apply for reentry for a period of 10 years. At that point, he could apply, but certainly under the current immigration policies, it is highly unlikely any visa would be approved. If a person is sentenced to more than a year in jail, however, there is a lifetime ban on reapplying for entry into the United States for any purpose. The Government in this case is seeking at least a one-year sentence on each of the defendants for this very reason.

The defense would argue that more than a year in jail is unnecessary. Starting with the caveat that a sentence should be sufficient but not more than necessary to accomplish the purposes of the sentencing statute, 18 U.S.C. §3553, the defense contends that a sentence of time served would be appropriate for these reasons:

Bharath Kakireddy has already been disenfranchised. His degrees from the United States will do little to advance his ability to obtain a job in India. Besides the humiliation and embarrassment of coming home under these circumstances, the validity of his degrees is thrown in question based on the events that occurred in the United States. He will have to start over from scratch.

Prohibiting any possible reentry into the United States for a lifetime does not serve the interests of the United States. As a whole, they have outstanding abilities and potential. Any one of them has the potential to accomplish tasks that would benefit not just the United States but the world. Should we really preclude them from ever applying for reentry? Of course they could be denied if they did reapply, but let's hold out the possibility that Bharath Kakireddy and others like him may prove over 10 years' time not

only their remorse for the actions leading to their deportation, but that they are now rehabilitated to the point where their presence in the United States would benefit our society. Perhaps one of them could develop a cure to some terrible affliction like Parkinson's or Alzheimer's Disease. The defense would contend that the Unites States is hurting its future by determining that none of these people should ever reapply.

Bharath Kakireddy did not kill anyone. He did not steal anything. He did not promote or become involved in drugs, gambling, or any other vice. He took steps to keep his status while continuing to work and looking for another school to complete his education and, hopefully, lead to permanent employment and future citizenship in the United States.

While he certainly made money in recruiting other students, this was not done under the table or behind the backs of anyone. Money was wired into his account by United States officials or he was given cash, fully accounted for. In fact, he was exercising the entrepreneurial skills encouraged by our society.

The fraud which is the gravamen of this offense was that Bharath Kakireddy enrolled in a school that he, certainly at some point, realized was not a real university. The original fraud, however, was perpetrated by the United States Government in creating the University of Farmington and then soliciting these students not only to enroll, but to encourage others to enroll as well.

Bharath Kakireddy's true intention is shown by his attempt to transfer to an accredited university to complete his studies.

The question this Court has to answer, among others, is whether the actions of an otherwise honest and hardworking foreign exchange student who was pursing his dream

to live and work in America, should be forever barred because he enrolled in the University of Farmington to avoid losing status and having to leave the country without completing his studies, knowing how unlikely it would be for him to be able to return if forced to give up his status and leave the country.

Bharath Kakireddy has been in federal custody in both county jails and at FDC-Milan since his incarceration. He has had no visitors, except for telephonic contact with a family member out-of-state, since his arrest in January of this year. By the time of sentencing, Mr. Kakireddy will have served close to ten months in federal custody.

Counsel contends that incarceration, together with the certainty of deportation, is sufficient to satisfy the punishment and deterrence factors in 18 U.S.C. §3553. There is no need to protect the public from further crimes of the defendant as he will be removed from the country. Nor does he need educational or vocational training, or other care.

Most importantly, when this Court considers the nature and circumstances of the offense and the history and characteristics of the defendant, it has a student. A young man who was striving to better himself for his family, who was placed in a predicament with few options. With only 15 days to obtain status, and with a glut of thousands of now-disenfranchised students looking to transfer to another school or suffer the same fate as Mr. Kakireddy, the admission process would just not work quickly enough to make decisions within those 15 days. The University of Farmington was the only viable option, short of returning to India. While in retrospect it certainly appears that would have been the better option, it is hoped this Court will understand the anxiety from which Bharath Kakireddy was suffering, and the efforts that he took to try to save his dream.

Enclosed please find several letters. The most significant is by Bharath Kakireddy, attached as Exhibit E. He describes his role in the offense and the devastating effect it has had on his life and future. He expresses remorse and shows contrition, explaining that his goal was to stay in the United States and not realizing the dire consequences of his actions.

Also included in Exhibit F are letters from his parents, relative and friends, describing his character as being a thoughtful, sincere and devoted son and student. They describe his strict morality, describing him as a kind person, generous, with strong ethics towards family, friends and community.

The letter from his parents is compelling. This family of meagre means scraped together their life savings to send their son to America to further his education, improve his lot in life, and provide him with the tools to be successful. They describe their son as humiliated and beaten. They do not believe that Bharath Kakireddy fully understood the consequences of his actions. They are correct.

What Bharath Kakireddy did was certainly against the law. His knowledge of breaking the law and the consequences are not a defense but are factors this Court should take into consideration when determining the appropriate sentence. Bharath Kakireddy will have to start over once he returns to India. This will be very difficult as news of this sort of conviction will certainly follow him in his pursuit of a job.

Having spent close to ten months in jail, and with the devastating effect this has already had on his life and the lives of his family and relatives, his future is in doubt.

Bharath Kakireddy committed a federal felony and is facing serious consequences, regardless of the imprisonment imposed by this Court. When balancing all of the factors,

and that should include the tremendous cost of continuing to incarcerate Bharath

Kakireddy following sentence in the United States, it is hoped this Court would consider
sentencing him to time served with an Order of immediate deportation.

Respectfully submitted,

/s/ David S. Steingold
LAW OFFICES OF DAVID S. STEINGOLD
BY: DAVID S. STEINGOLD (P 29752)
Counsel for Defendant
500 Griswold Street, Suite 2320
Detroit, Michigan 48226
(313) 962-0000 (phone)
(313) 962-0766 (fax)

Dated: August 15, 2019

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERIC
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Plaintiff.

٧.

Case No. 19-20026 Hon. Gershwin A. Drain

BHARATH KAKIREDDY, et al.

Defendants.

Timothy P. McDonald (P64562) Attorney for Plaintiff U.S. Attorney's Office 211 W. Fort Street, Suite 2001 Detroit, Michigan 48226 (313) 226-9100 David S. Steingold (P29752) Attorney for Defendant Bharath Kakireddy Law Offices of David S. Steingold 500 Griswold Street, Suite 2320 Detroit, Michigan 48226 (313) 962-0000

#### **CERTIFICATE OF SERVICE**

DAVID S. STEINGOLD (P 29752) hereby certifies that on August 15, 2019, I electronically filed the above-annexed pleading with the United States District Court for the Eastern District of Michigan using the ECF/CM electronic filing system which will automatically send electronic notification of this filing to all attorneys of record for all parties.

Respectfully submitted,

/s/ David S. Steingold
DAVID S. STEINGOLD (P29752)

# **EXHIBIT A**



# List of Schools Accredited by the Accrediting Council for Independent Colleges and Schools (ACICS)

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Art Institute of Phoenix

Art Institute of Salt Lake City

Art Institutes International -Kansas City, The

Atlantic University College

**Beckfield College** 

Bergin University of Canine Studies

# C-F

California Aeronautical University

California International Business University

California Miramar University

California University of Management and Sciences

# G-N

Global Health College

**Globe University** 

Globe University -Appleton

Globe University - Eau Claire

Globe University -La Crosse

Globe University -Madison East

Globe University - Minneapolis

# P-V

Pacific States University

Pioneer Pacific College

Pioneer Pacific College - Eugene Branch

Provo College

Radiological Technologies University VT

San Ignacio University

Beverly Hills Design Institute 2:19-cr-20026	California University	Globe University - f្រែសហុខកុត្តា(39 PageID.:	Sanford-Brown ଓଡ଼ିଆ-ନୁକ୍ରେ 15 of 50
Bon Secours Memorial College of	Sciences San Diego Branch	Globe University - Wausau	Sanford-Brown College Online
Nursing Bristol University	Cambridge Junior College	Globe University- Moorhead	Sanford-Brown College-Chicago
Broadview Entertainment Arts	Career Point College	Harrison College	Santa Barbara Business College
University Broadview University - Boise	Career Point College - Spencer Lane Branch	Hickey College Hondros College of Nursing	Santa Barbara Business College - Online
Broadview	Charter College	Humacao	Schiller
University-Orem  Broadview	Charter College - Oxnard	Community College  ITT Technical	International University
University-West Jordan	Charter College - Vancouver	Institute Iglobal University	Seattle Film Institute
Brookline College Brooks Institute	Charter College, Fife, WA	International Business College	Sentara College of Health Sciences
Brown Mackie	City College	International	Shepherd University
College - Akron  Brown Mackie	Coleman University College of Business	College of Health Sciences	Silicon Valley University
College - Atlanta Brown Mackie	& Technology  Colorado Heights	Jones College  Jose Maria Vargas	South College- Asheville
College - Boise Brown Mackie	University  Daymar College	University Key College	Southern States
College - Cincinnati	Daymar College	Kingston University	University Southern Technical
Brown Mackie College - Dallas/Ft. Worth	(Online)  Design Institute Of	Le Cordon Bleu College of Culinary	College Spencerian College
Brown Mackie College - Findlay	San Diego  Dewey University	Arts Scottsdale  Lincoln College of	Stevens - The
Brown Mackie	Mayaguez	Technology  Lincoln University	Business and Arts
College - Fort Wayne	Dewey University- Carolina Campus	Living Arts College	Stratford University Stratford University
Brown Mackie College - Greenville	Dewey University- Hato Rey Campus	@ School of Communication Arts	- Alexandria Campus
Brown Mackie College - Indianapolis	Dewey University- Juana Diaz Campus	Louisiana Culinary Institute	Stratford University - Glen Allen

Brown Mackie Collegese <u>Louisviile</u> 0026	Dewey University- - <b>เพล</b> ท <del>ส์เ</del> ACar <del>ก</del> ณิร No. 90	MDT College of	Stratford University 61Vir <mark>gage Be</mark> atի
Brown Mackie College - Merrillville	Digital Media Arts College	Inc. Madison Media Institute	Stratford University Baltimore Campus
Brown Mackie College - Miami	Duluth Business University	Marconi International	Sullivan College of Technology and Design
Brown Mackie College - North Canton	EDIC College Eagle Gate College	University, Inc.  Medtech Institute	Suncoast College of Health
Brown Mackie College - Phoenix	East West College of Natural Medicine	Miami Regional University	Texas Health and Science University
Brown Mackie College - San Antonio	Eastwick College  Everest College	Millennia Atlantic University	Texas Health and Science University- San Antonio
Brown Mackie	Everest University -	Miller-Motte College	Campus Addition
College - South Bend	Brandon  Everest University -	Minneapolis Media Institute	The Art Institute of St. Louis
Brown Mackie College - St. Louis	Jacksonville  Everest University -	Minnesota School of Business	The Art Institute of Tucson
Brown Mackie College - Tucson	Lakeland  Everest University -	Minnesota School of Business - Blaine	The Art Institute of Wisconsin
Brown Mackie College - Tulsa	Melbourne  Everest University -	Minnesota School of Business - Elk River	The Art Institute of York - Pennsylvania
Brown Mackie College- Northern Kentucky	North Orlando  Everest University -	Missouri College	The Art Institutes International Minnesota
Brown Mackie	Orange Park	National College	The Digital
College- Albuquerque	Everest University - Pinellas	Neumont University  Nobel University	Animation & amp; Visual Effects
Bryan University	Everest University - Pompano Beach	Nobel University -	School
	Everest University -	Buena Park	Tribeca Flashpoint College
	South Orlando  Everest University -	North American University	UAC School of Global Management
	Tampa	Northwestern Polytechnic	UEI College
	Florida Career College - Miami	University	Unilatina International
	Florida Career College - Pembroke Pines		College

Florida Technical

Case 2:19-cr-20026-CAR EGES ECF No. 90 filed 08/15/19 PageID.362 Page 17 ef 50 page of Puerto Rico

University of Antelope Valley

University of North America

Virginia College

Virginia International University

Virginia University of Oriental Medicine

# EXHIBIT B



### University of Farmington

Office of Admissions 30500 Northwestern Highway Farmington Hills, MI 48334

May 15, 2017

Bharath Kumar Kakireddy 900 Discover Blvd., Apt. 13103 Cedar Park, TX 78613

Dear Bharath,

It is with great pleasure to inform you of your admission to the University of Farmington for the Summer 2017 Quarter.

You were chosen from the largest and most competitive applicant pool in the institution's history for this opportunity. On behalf of myself and our faculty, students, and alumni - congratulations and welcome to the global community that is the University of Farmington!

Your admission to the University of Farmington is a reflection on your past academic achievements and future goals. We are confident in your ability to prosper and succeed at the University of Farmington.

At the University of Farmington, you will be part of a diverse community, where undergraduate, graduate, and international students work alongside renowned faculty in an environment of ingenuity, creativity, and innovation. The professional faculty at the University of Farmington are drawn directly from business and industry and will provide you experiences needed to succeed in your career by exposing you to a blend of traditional, applied, and practical educational opportunities.

The opportunities a degree from the University of Farmington holds are endless.

If you have any further questions regarding your acceptance and next steps in the admissions process, please contact us at admissions@universityoffarmington.edu.

The University of Farmington community welcomes you, and I personally look forward to greeting you on campus.

Sincerely,

Ali Milani Director of Admissions 0026-GAD-EAS ECF No. 90 filed 08/15/19 PageID.365 Page 20 of 50

University of Farmington

Student and International Affairs

30500 Northwestern Highway Farmington Hills, MI 48334

# University of Farmington **Curricular Practical Training (CPT) Agreement**

#### Overview

Curricular Practical Training (CPT) is defined by US immigration regulations as "alternate work/study, internship, cooperative education, or any other type of required internship or practicum which is offered by sponsoring employers through cooperative agreements with the schools." [8CFR 214.2(f)(10)(i)]

In order for a student to be eligible for CPT, and to receive permission to work from the International Office, the following conditions must be met:

- 1) The student must have been enrolled full-time for at least two semesters, and must be maintaining F-1
- 2) The student must complete the CPT during his/her studies. This may be during summer or in any other semester before the student graduates. If the student has completed all course/thesis requirements for the degree, the student is not eligible for CPT, but must instead apply for Optional Practical Training (OPT).
- 3) The CPT must be an integral part of an established curriculum so that the training:
  - a. is required of all students in that program of study; or
  - b. is required for a particular course; or
  - c. is offered under a cooperative agreement between the university and the employer;

#### 4) The student must secure a letter from the prospective employer indicating:

- □ *Job title* ☐ Start date of employment (MM/DD/YYYY) ☐ End date of employment (MM/DD/YYYY) □ Number of hours per week ☐ Physical address of employment ☐ Brief description of duties ☐ The letter must be signed and on company letterhead
- 5) The student must register for the course requiring the completion of an internship that his/her department has designated for the CPT. The course must be for at least one credit hour, and the student must register for the course during each semester that he/she is authorized for CPT.
- 6) If all of the above eligibility requirements have been met, the student will be authorized to work for the requested period of time. The authorization is in the form of an endorsement on the student's I-20 that specifies the employer, the location of the employment, and the dates of employment.

# Important Points to Remember:

- The student may not begin working for the employer until he/she has been authorized to do so by UF's Designated School Official (DSO) in the International Office. The authorization will be printed on the I-20.
- The student may only work for the employer named in the authorization and may only work during the dates indicated.
- A student who has engaged in 365 days or more of full-time (21 hours or more per week) curricular practical training will not be eligible to engage in Optional Practical Training in the same level of education degree.

# How to Apply for CPT:

This checklis	is designed to help students requesting authorization for CPT in order to complete an internship
	Read all information thoroughly. If you have questions contact the Office of Student and
International	

	(Make sure your a	advisor signs the	e form.)	ommendation for	Currental Fractical Framing 101111.	
2)	Obtain supporting	g documentation	if required (see reco	ommendation form).	•	
3)	The student	must secure a l	etter from the pros			
		title ort data of amplo	yment <b>(MM/DD/YY</b>	VV)		
			ment <b>(MM/DD/YYY</b>			
		mber of hours p		-/	•	
		ysical address o				
	$\square$ Bri	ef description o	f duties			
	☐ The	e letter must be s	signed and on compa	my letterhead		
3)	Schedule an apport for CPT.	intment with the	Director of Internat	ional Office to revi	ew your materials and be authorized	
		ollowing items t	to the advising meeti	ng:		
			ation for Curricula		g form	
		ng documentatio			<b>6</b>	
	☐ Employer	r Letter (see para	agraph #4 above)			
	•			•		
By sign	ing below, I ackno	wledge that I ha	ive read and understa	and my responsibilit	ties under CPT.	
Student	Name: Bharath K	Kakireddy		Student ID#: 201	<u>170605216</u>	
Signatu	re:			Date: March 1	0.2018	
J	· <del>-</del> ·			Date. WHICH I	2, 2016	
			IN INTERNSHIP		completed by Int'l Director/P/DSO):	
	and the second s		oll in internship co	arse indicated by a	advisor? Yes No 🗌	
Edwa	ard Roberts Ph.	D.	Edward R	oberta	March 19, 2018	
Print N	ame of Director/P	P/DSO	Signature of DSO		Date	
**N					pproval. You must enroll in an icial CPT approval**	
5)	documents, and p	provide the Dire	internship course, so ctor/P/DSO with pro be issued endorsing	of of course enrolln	Il CPT forms and supporting nent. Upon receipt of proof of	
Edwa	ard Roberts Ph.	.D.	Edward R	oberta	March 19, 2018	
	ame of Director/P		Signature of DSO	·	Date	
	-		<del>-</del>			
					CPT Agreement Form Page 2	

### 0026-GAD-EAS ECF No. 90 filed 08/15/19

PageID.367 Page 22 of 50 University of Farmington

> Student and International Affairs 30500 Northwestern Highway Farmington Hills, MI 48334

# University of Farmington Curricular Practical Training (CPT)

# **Advisor Recommendation for Curricular Practical Training Form**

<u>To the student</u>: Please complete the following information then meet with your academic advisor to discuss your proposed training.

Last Name: Kakireddy First Name: Bharath Kumar ID#: 20170605216

<u>To the student's academic advisor</u>: The student listed above wants to apply for work permission under Curricular Practical Training (CPT). In order to be eligible for this program, the above student must:

- 1) be enrolled in a program of study in which the practical training is an integral part of an established curriculum so that the training:
  - a. is required of all students in that program of study; or
  - b. is required for a particular course or circular track; or
- c. is offered under a cooperative agreement between the university and the employer; AND,
- 2) complete the CPT prior to completion of all requirements for their program of study.

To	det	termine the student's eligibility for CPT, the following information is required.
	I.	Internship Requirement (please CHECK the appropriate option(s)):
		□ 1) The student is participating in a cooperative educational agreement between the

- university and the employer. <u>Must provide copy of the co-op agreement</u>.
- 2) The student is enrolled in a degree program which <u>requires</u> all students to complete an internship to complete the program of study. Requirement must be published in the university catalog. (If this box is checked, then by default "Box 3" also applies.)
- ☑ 3) The student is approved to enroll in a course or curricular track which requires the completion of an internship and counts toward the student's program of study requirements. (Note: Course or curricular track with internship requirement must be listed in the university catalog.)

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11.	Status	01 <b>Stu</b>	aeni m	Degree	Program:

	- 1	ments in (semester and year): Summer 2019	•
Academic Adv	risor: A. Speros	Department: Graduate Advising	

Signature: Angelique Speros Date: March 19, 2018



### **University of Farmington**

Student and International Affairs
30500 Northwestern Highway
Farmington Hills, MI 48334

### Bharath Kumar Kakireddy

As part of your program, you must fulfill an externship every academic term of enrollment. As an international student, this requirement can only be met through Curricular Practical Training (CPT) authorization. As such, CPT will be authorized for up to one year upon registration. In addition, CPT can be authorized upon enrollment, on "Day 1", if all the requirements are met at time of registration.

CPT is "job-specific" meaning that it is authorized for a specific job and for the specific amount of time that you will be employed. In addition, the University of Farmington Office of Student and International Affairs will review your proposed CPT employment to ensure it is an integral part of your program's curriculum.

Therefore, a job offer letter is required in order to apply for CPT. Job offer letter must be printed on company letterhead and signed, and must include the following:

- Your start date and end date
- The number of hours per week that you will be working it is not sufficient for it to say "part-time" or "full-time" (see Part-time versus Full-time below)
- The physical location (street address, city, state, and ZIP code) where the job will be conducted P.O. Boxes are not acceptable
- Job title and description

Note: If the job offer letter issued to you by your employer does not contain all the necessary information, please ask your employer to write an additional memo including the missing formation and upload this along with your official job offer letter when requesting CPT.

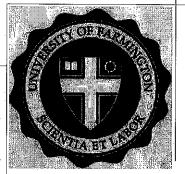
Best of luck in your continuing academic endeavours.

Edward Roberts

Dr. Edward Roberts, Ph.D. Director of Student and International Affairs

248.702.6719

studentaffair@universityoffarmington.edu



# International Students

# Application for Admission

All International Students, both undergraduate and graduate, must complete the form below. Return completed applications to University of Farmington, Office of Admissions, 30500 Northwestern Highway, Suite 210, Farmington Hills, MI 48335 or email to admissions@universityoffarmington.edu. A non-refundable application fee of \$100 is required prior to processing. Payments may accompany application or be invoiced upon receipt.

G	eneral Information	Check one: Undergraduate	application	ation	
  kaki	reddy	Bharath kumar			
1.	Family name	First	Middle	Maiden	· · · · · · · · · · · · · · · · · · ·
2.	Gender Male ☐ Female	3.Date of birth [Month/Day/Year] 06	<u>,10</u> ,1989	4.Place of birth <i>[City, Country]</i> Manaj	ipet,India
5.	Mailing address (This address will b	e used for all university correspondence)	Number and Street	Apt#	
900	Discover Blvd Apt 13	103 Texas	78613	USA	
	City	State or Province	Postal Code	Country	
6.	Permanent address (In your home o	ountry) Number and Street	Apt <b></b> ≢	<u> </u>	
	City	State or Province	Postal Code	Country	<u> </u>
7.	Primary email	Secondary email		Phone number	
8.	Which of the following do you co	onsider to be your racial/ethnic backgrou	ind? Please check any that apply.	☐ White/Caucasian ☐ Other	• :
9.	What is your native language	?			
Ci	tizenship				
. 10	Country of citizenship India		Passport Number (attach cop	y)	<u> </u>
	. Are you a permanent resident of .	the United States? (If yes, please submit a control on a valid visa?	copy of your green card) Yes [  If yes, what visa do you have? F		
13	. What type of visa will you use to				· 
14	. Have you applied to UF befor	re? 🗀 Yes 🗹 No 15. To which	session and year are you applying I	now? Summer 2017	٠.
16.	What type of student will you be	? Non-degree-seeking student	☐ Visiting/Exchange student {	Degree-seeking student	: :
17.	At which level will you study?	□ Bachelor's			
18.	What is your intended academic	major and degree?	Jedna v		

Educational Background						•
19. Please list all high schools and	d universities you have attended.					
					S. A. C.	en e
Star Table Is also S and Hilli	CONTINUE DE LA SERVICIO DEL SERVICIO DE LA SERVICIO DEL SER			Several of Service of	A STATE OF THE STA	The state of the s
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20. If you have not graduated from	m your current school, list each class yo	u are taking in your fin	al year.			
最終的。A.C. A.E. A.E. A.F. Mar (Const. ) Elemi			a and din determination.	F	Setali (al Boulo III I.o. Set	No e認的以一日 + 6季 基础的
		100 mg / 100				
21. Are you on probation, suspens	ion or dismissal at another college or u	niversity? 🗆 Yes [	□ No If yes,	please explain.		
						-
22. Please list scores and test d	ates for any exams you have comple	eted.			*	
TOEFL/IELTS			ga, eti illi sibaa			
ACT/SAT			·			
GRE/GMAT						
<b>4</b>	<u>.                                    </u>					
23. How did you learn about th	ne University of Farmington? Frie	end -Santosh	Reddy			
Emergency Contact	,					·
24. Parent/Guardian Sp	oouse Other————————————————————————————————————		First		Middle	
			/	/		
Phone number	Email		•	Address		
Attestation				,		
25. Did an agency help you with y	our application to UF? 🗆 Yes 🛂 N	lo ·				
If you write the same of the	Ab. 4 5-3 - 3					
If yes, write the name of the agent	cy or company that assisted you.			- All Innovative -	•	
26. I certify that the information p	rovided on this application is true and c	omplete, I understand	that the misrep	resentation of fac	s will be cause for refus	al or revocation
of admission to the university.	· ·				d.	
					5/15/17	
Legal Signature				Date	-	

From:

studentaffairs@universitvoffarmington.edu

To:

"Bharath k"

Cc: Subject: "ali.milani@universityoffarmington.edu"

Date:

FW: course Scedule and Timing Thursday, October 19, 2017 1:38:00 PM

Attachments:

KAKIREDDY,UF#20170605216.schedule.Fall2017.pdf TERUVAI.UF#20170899078.schedule.Fall2017.pdf KONJARLA.UF#20170602411.schedule.Fall2017.pdf REPALA.UF#20170973363.schedule.Fall2017.pdf

PFA class schedules.

From: Ali Milani [mailto:ali.milani@universityoffarmington.edu]

**Sent:** Thursday, October 19, 2017 12:33 PM **To:** ned.roberts@universityoffarmington.edu **Subject:** FW: course Scedule and Timing

Sent from Mail for Windows 10

From: Bharath k

Sent: Thursday, October 19, 2017 12:28 PM

To: Ali Milani

Subject: Re: course Scedule and Timing

Hello Mr Ali,

Can you please share me the Details of the course Schedule along with the Timing for this semester enrolled.

- 1. Bharath kumar kakireddy
- 2. Shashikanth Konjarla
- 3. Sravan kumar Repala
- 4. parthasarathi Teruvai

Thanks,

Bharath

On Wed, Oct 11, 2017 at 2:35 PM, Bharath k < hearathk6688@gmail.com > wrote:

Hello Mr Ali,

Bharath kumar kakireddy Shashikanth Konjarla Sravan kumar Repala Thanks, Bharath

On Wed, Oct 11, 2017 at 2:25 PM, Ali Milani <ali.milani@universityoffarmington.edu> wrote:

Who are the guys that need the schedule?

Sent from Mail for Windows 10

From: Bharath k

Sent: Wednesday, October 11, 2017 1:44 PM

To: Ali Milani

Subject: course Scedule and Timing

Hello Mr Ali,

Can you please share me the Details of the course Schedule along with the Timing for this semester which i have enrolled.

Thanks, Bharath

# EXHIBIT C



bharath kakireddy <br/> <br/> bharathkakireddyk@gmail.com>

# Congratulations from New England College!

Casey Walker < cwalker@nec.edu>

To: "bharathkakireddyk@gmail.com" <bharathkakireddyk@gmail.com>

10 January 2019 at 10:34



School of Graduate and Professional Studies

BHARATH KUMAR KAKIREDDY

822 ROSELING CIRCLE UNIT 220 LAKEMARY LAKEMARY, Florida 32746 United States

Dear BHARATH KUMAR,

Congratulations! I am pleased to inform you of your acceptance into New England College's MS Executive Computer Information Systems (Day 1 CPT) program, with a Spring I 2019 Executive start date - January 14. We are delighted to welcome you to New England College, and promise you a high quality program, one that is interactive and challenging, providing you with the expertise that will raise you above the competition.

Please refer to the attached document for answers to frequently asked questions, including residency dates.

In order to transfer to New England College, you will need to provide your current institution with the NEC SEVIS school code: **BOS214F00408000**.

We ask that you keep us updated on your current address, telephone number, and email address, so that we may send you important updates and schedule information.

On behalf of all of us at New England College, I again congratulate you on your acceptance. We look forward to seeing you on campus.

Your official, hard copy acceptance letter will be given to you with your NEC I-20. Your NEC I-20 will be processed after your current university transfers your SEVIS record to NEC.

Sincerely,

Stephanie Kelliher

Director of Enrollment

2 attachments — Download all attachments



International Transfer-in form.pdf 422K View as HTML Download From:

Bharath k

To:

 $\underline{studentaccounts@universityoffarmington.edu}$ 

Cc:

Student Affairs

Subject:

SEVIS Transfer Out Request for 1/11/2019

Date: Attachments: Friday, January 11, 2019 12:06:57 PM Acceptence letterNew England College Bharath.pdf

International Transfer-in form Bharath kumar kakireddy.pdf

#### Hị Team,

This is **BHARATH KUMAR KAKIREDDY** Please Transfer my SEVIS to the New England College please find the Attachment of the Transfer form and please transfer my SEVIS ASAP Today **1/11/2019** since.My new course is going to start on 1/14/2019 Monday.And please update me once you transfer my SEVIS to the New College.

First name: Bharath kumar Last name: kakireddy Date of Birth: 06/10/1989

Thanks, Bharath

# EXHIBIT D

# Deloitte.

Daloitta Consulting LLP

30 Rockefeller Plaza 41st Floor New York, NY 10112-0015 USA Tel: +1 212.492.4000 http://www.delpitte.com/

March 09, 2018

Bharath kumar kakireddy

Dear Bharath kumar:

On behalf of Deloitte Consulting LLP and Ayan Chatterjee, it is my pleasure to formally confirm our offer to you to join Deloitte Consulting LLP as a Solution Analyst in the Application Management. Services group, based in our Orlando office. Your tentative start date will be March 19, 2018 or on a mutually agreed upon alternate date acceptable to Deloitte Consulting LLP. This offer, and the opportunity it represents, is extended with great confidence in your ability. We are excited about the possibility of you joining Deloitte Consulting LLP.

This offer and, if you accept, your subsequent employment, are contingent upon you obtaining and maintaining any required personnel security degrances.

Deloitte is a place where we grow leaders to thrive. We focus on maximizing your strengths so you grow in the areas where you are energized and at your best. Bharath kumar, we believe in your potential and we hope that you accept the opportunity to join our high-performing organization.

Your salary will be at the annual rate of \$70,000.00, payable in bi-weekly installments, on alternating Fridays, less applicable taxes and deductions. As an incentive to join beloitte Consulting LLP, you will receive a signing bonus of \$5,000.00 (less applicable taxes) with your first paycheck, subject to and after the successful completion of your background investigation. As part of this offer, we will provide you with a relocation assistance payment of \$5,000.00 towards your move.

The attachments include further details about your offer, your potential career development, and your personal rewards. Please read the information carefully and let us know if you have any questions.

We look forward to hearing from you. For planning purposes, we would appreciate your response to this offer by March 12, 2018. Our offer will be valid through this date. Please contact your recruiter if you would like to discuss any aspect of this offer prior to making your decision.

Sincerely yours,

Defoitte Consulting LLP

By:

Janet Foutty
Chairman & CEO

DELOITTE CONSULTING LLP c/o JUSTIN KADICH GUBERMAN GARSON LLP 22 ADELAIDE ST WEST FLR 9 TORONTO, ONTARIO M5H 4E3 CANAD 75 Lower Welden St. St. Albana, VT 05479

U.S. Citizenship and Immigration Services



U.S. Department of Homeland Security U.S. Citizanship and Immigration Services

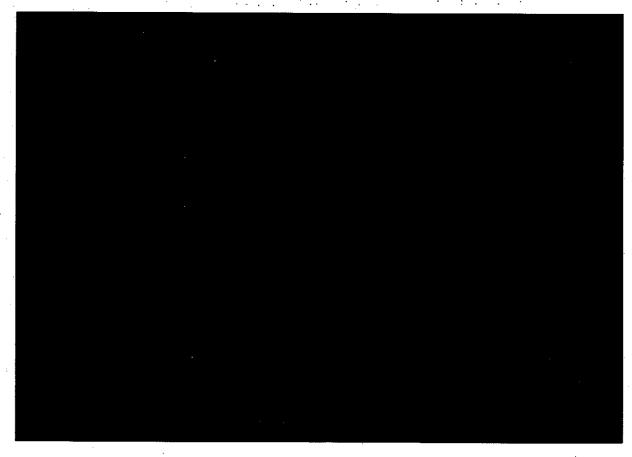
EAC1814052245

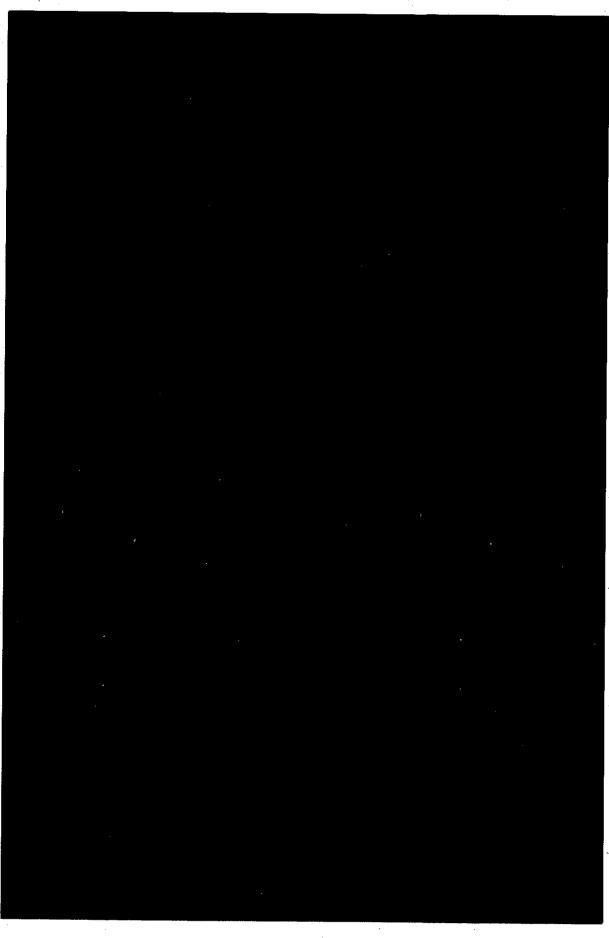
RE: BHARATH KUMAR KAKIREDDY I-129, Petition for a Nonimmigrant Worker

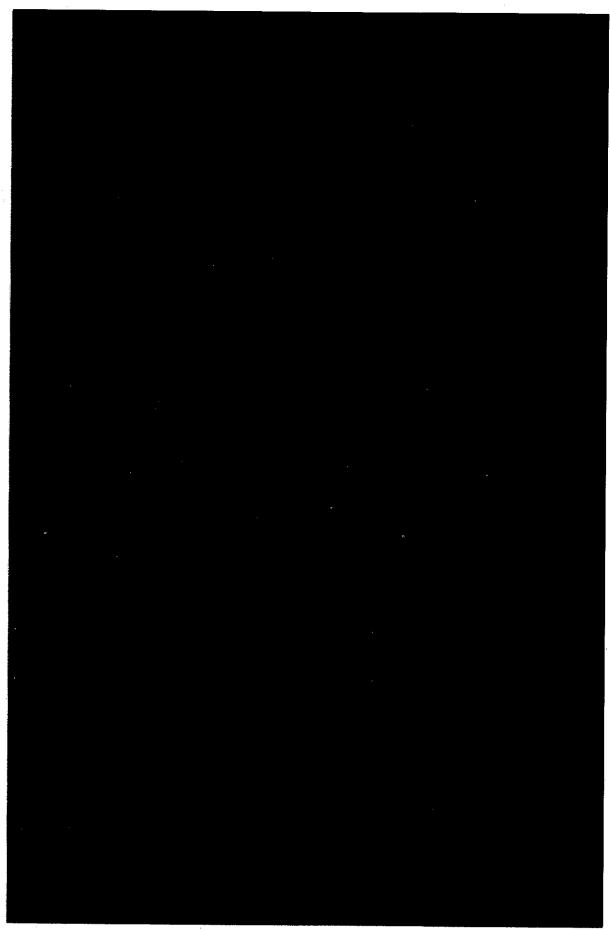
#### INTENT TO DENY

Dear Sir/Madam,

U.S. Citizenship and Immigration Services (USCIS) is notifying you of its intent to deny the Petition for a Nonimmigrant Worker (Form I-129) you filed on April 12, 2018, to classify Bharath Kumar Kakireddy as a Solution Analyst under section 101(a)(15)(H)(i)(b) of the Immigration and Nationality Act.



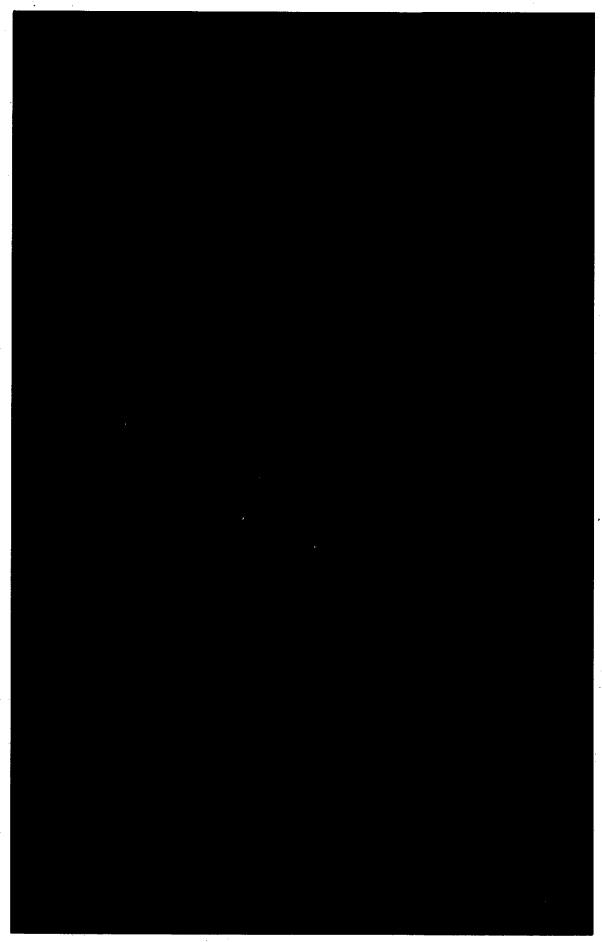




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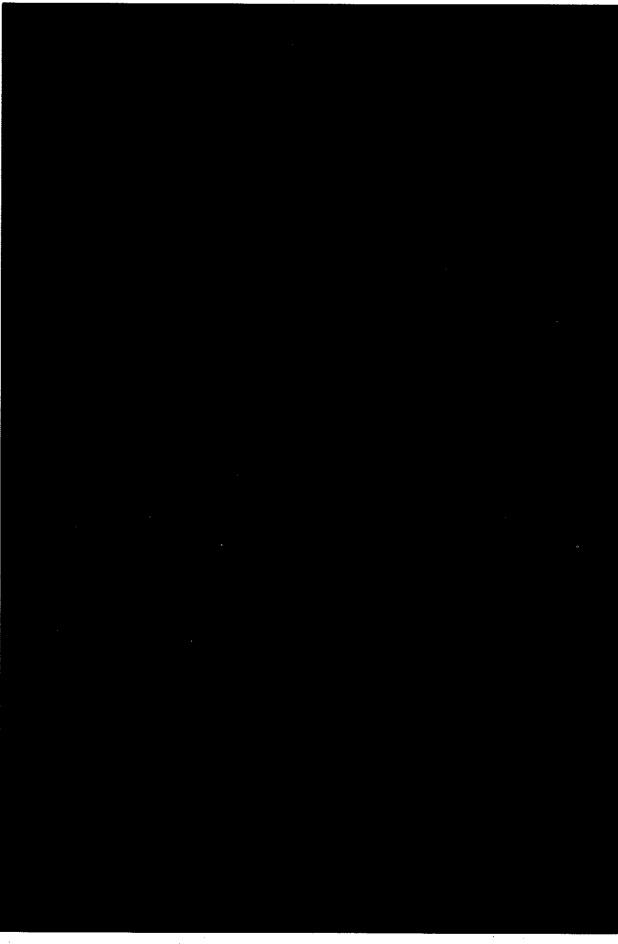
3 of 7

vww.uscis.gov

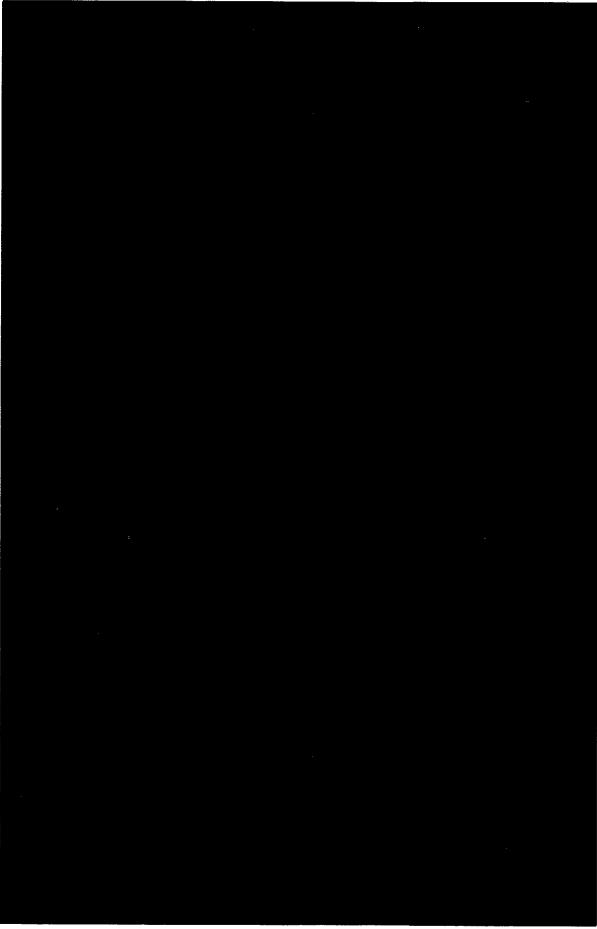


VSC1129VSCINT000006469R33

Case 2:19-cr-20026-GAD-EAS ECF No. 90 filed 08/15/19 PageID.383 Page 38 of 50



Case 2:19-cr-20026-GAD-EAS ECF No. 90 filed 08/15/19 PageID.384 Page 39 of 50



VSCI129VSCINT000006469833

6 of 7

www.uscis.gov



**Maintenance of Status** 

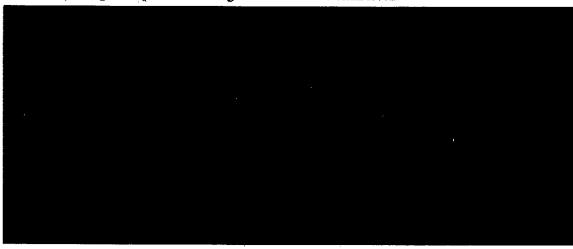
## Multiple Years of Practical Training at Same Education Level

It appears that the beneficiary was granted more than 12 months of practical training at the same educational level. Students may be authorized 12 months of practical training, and become eligible for another 12 months of practical training when he or she changes to a higher educational level.

Evidence indicates that the beneficiary attended Silicon Valley University and was granted post completion optional practical training after the beneficiary completed his Master's degree, which was valid from June 01, 2016 to May 19, 2017.

Evidence indicates that the beneficiary also attended University of Farmington and was granted curricular practical training while the beneficiary was completing his subsequent Master's degree, which was valid from June 05, 2017 to June 04, 2018. The beneficiary was subsequently granted an extension to February 28, 2019.

Submit a detailed statement, along with supporting evidence to explain the periods of time the beneficiary was granted practical training at the same educational level.



Sincerely,

Jausa Juchowski

Director

## **EXHIBIT E**

### August 6, 2019

### Dear Judge Drain:

I was in desperate need to join the University of Farmington since my old university's accreditation agency was removed by the Department of Education for a period of time until it was restored. That caused me to search to join a new school in a very short period of time.

Due to the cancellation of the accreditation body, many schools had lost their recognition and caused many students to have to look for other schools. Since a large number of applications were flooding the schools, it took much longer for the different schools to process the applications. Since the University of Farmington offered to provide admission immediately and work authorization, together with it being less expensive compared to other schools, I joined to save my status to live in this country. I also helped my friends obtain admission so that they could continue to stay in the United States. Many of these students tried to apply directly to the University but were turned down and told to go to me to refer them for admission.

Making money was not my priority. I wanted to help my friends and myself stay in the country to continue our education and work towards our dream of becoming United States citizens.

I did make money with the referrals. This is a rather common practice at these colleges and universities. They offer tuition help as well as bonuses for referring students.

If I would have obtained my OPT extension of 24 months (optional practical training work authorization), that I was going to receive from the USCISC, I would not have joined any university as I would have already paid my tuition at Silicon Valley before it lost its accreditation. I had to pay a fee for a second university to save my status.

I was born in a middle class agricultural family in India where my father is a farmer and my mother is a housewife. My sister is a married housewife. I am the only son who supports my parents to help make ends meet. My parents were very keen to provide me good education so that I could excel in my career. It was my childhood ambition to fulfill the dreams of my family, therefore I worked hard at my academics in order to achieve a better education.

I had completed my bachelor's degree in India and worked for a software company, coming to the United States for my master's degree. My parents borrowed money for my education in the U.S. I received my master's degree in computer science

from Silicon Valley University, in San Jose, California, with a 3.7 GPA in April 2016. Later I worked an internship in a software company and moved to Deloitte Consulting in Lake Mary, Florida, in March 2018 as a solution analyst.

I want to take care of my father and mother since I am their only son. They are facing a tough life since I am in jail here. Because of my actions, my family is suffering as going to jail is a very embarrassing and humiliating circumstance in India. My parents are suffering and that is my greatest regret.

I intend to devote myself to community service and helping senior citizens. I want to spend some of my future career in educating the uneducated rural children where proper education is not received in my native country.

I made a terrible decision that will drastically change my life. All the work I have put into achieving my master's will not serve me in India. I will have to start over. Worse than that I will have to deal with the pain and humiliation I have caused to my family. I truly regret my actions and accept full responsibility for what I have done. I apologize to the Court and to all those who have been affected by my decisions.

Very truly yours,

**Bharath Kakireddy** 

# **EXHIBIT F**

July 19, 2019

Honorable Gershwin A. Drain United States District Court For the Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 751 Detroit, Michigan 48226

Re:

United States of America v. Bharath Kakireddy, et al.

Case No. 19-20026

Dear Judge Drain,

On August 22<sup>nd</sup>,2019 Bharat Kakireddy will stand before you to be sentenced on his plea to harboring aliens. Mr. Bharat Kakireddy is our only son. We would like to offer you our thoughts about his character.

Bharat Kakireddy is a social conscious person. He likes to help his friends, relatives as possible as he can do.

We are somewhat familiar with the underlying facts of this case. We know that our son Mr. Bharat Kakireddy's main intention for recruiting students to Farmington university was to assist them and to prevent them from being deported or having to leave the country voluntarily until they found a new university.

His thought was that he is helping students to prevent them from being deported. We think, he did not know that, it's an offense at that time. If he got a thought that it may lead to be a crime, he could not recruit students to the university, so he doesn't like to do such illegal activities.

Bharat Kakireddy believed that school where he was studying Silicon Valley has accreditation with Government of US. Unfortunately, it's accreditation wrongfully denied.

Bharat Kakireddy is a man strongly devoted to our family and his friends. We know that because he thinks always to be obedient and honest to family members and help full to friends.

Now Bharat Kakireddy knows that he had made a big mistake unknowingly. He had never done this type of mistake in the past in India. Even he doesn't think to do such things. We know he is suffering both physically and emotionally from this prolonged incarceration. He knows that whenever he is released he will be to be put back into custody, this time under the authority of ICE, and he will be certainly imported to India.

We are requesting this court to consider Mr. KAKIREDDY'S excellent back ground and strong support from family and friends. He is humiliated and beaten. He can understand that due to this case he will not be allowed to reenter the US.

As his intention was to his work study and obtain a full time in the US, something he had accomplished at the time he was arrested, this means Bharat kakireddy must start over this time in India. It is a devastating setback to his career goals.

This court has a wide variety of options at sentencing. Our desire that this court consider sentencing our son Mr. Bharat Kakireddy to the time he has already served in prison and send him home to India.

Thank you, sir,

Yours sincerely

Bhagyamma Kaki Reedy

Shekhar Reddy Kaki Reddy

K, 25 /5 20 6

Manajipet village Ghanpur mandal Wanaparthy distract Telanagana

India- 509380

July 19, 2019

Honorable Gershwin A. Drain United States District Court For the Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 751 Detroit, Michigan 48226

Re:

United States of America v. Bharath Kakireddy, et al.

Case No. 19-20026

### Dear Judge Drain

With your permission I request to bring the following matter to your notice. A case relating to Mr. Bharat Kakireddy is coming before you on August 22<sup>nd</sup>,2019 and he is going to present before you on the day. As per as I know about Mr. Bharat kakireddy. I want to put before you with your kind permission.

I and Mr. Kakireddy are very close friends from our childhood days. We are also class mates. Bharat kakireddy used to move closely with everyone. He did not hurt anyone, generally he will adjust with everyone and he is very soft in his activities.

He is also intelligent in his studies. If anybody needs help, he used to respond immediately in particularly regarding studies. He never participated in anti-social activities and against to college rules and regulations. Moreover, he opposed the students who behaved against to college rules

Bharat Kakireddynever participated in anti-socialactivities, particularly related to career. His main ambition is to lead a good and moral life in society with ethics. By this time, I can imagine Mr. Bharat both physically and mentally facing much troubles with this case. He is already damaged with this case, he must start his career again.

Thank you sir,

Yours sincerely

Vamshi dhar Reddy G H No 1-28 Achithapur village Wanaparthy district Telangana India- 509103 Honorable Gershwin A. Drain United States District Court For the Eastern District of Michigan Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 751 Detroit, Michigan 48226

Re:

United States of America v. Bharath Kakireddy, et al.

Case No. 19-20026

Dear Judge Drain:

On August 22, 2019, Bharath Kakireddy will stand before you to be sentenced on his plea to harboring aliens. I have known Bharath Kakireddy for <u>16years</u>. I would like to offer you my thoughts about his character.

Bharath Kakireddy is <u>one of my known relative and friend.</u> We have begun both of our bachelor's degrees at the same time, we also started our careers in IT at the same stage, laterBharath went on to pursue his master's degree in ITfield from Unites states.

Bharath is, in short, kind of person who takes the better side. He has always been a kind and generous with people around him. His work ethics and sensibilities towards family, friends and Community are so strong and positive. I still remember the talks, thoughts, ideas and his concern towards peopleand their lives in the close by slum communities.

I have come to knowthe Primary moral reason of Bharath's involvement in Recruiting people for Farmington University was to prevent the students to get deported and maintain valid status until a new university has been found. I have also Understood that Bharath got into this Farmington university, as his earlier school Silicon Valley University accreditation got denied while he was pursuing his STEM.

Bharath might have got realized what he had done was not so legitimate, legal guilt should have made him suffer Mentally and Physically. Being Only Son to his parents, this whole thing made them suffer pain and depression.

I request and hope that all the good things and positive morale of Bharath shall be considered in the process of Decision making.

Manipal Reddy.

#204, Jaya Krishna Enclave, Hastinapuram, Hyderabad

500079.

Honorable Judge Gershwin A. Drain

Date: 30th July, 2019

**United States District Court** 

For the Eastern District of Michigan

Theodore Levin U.S. Courthouse

231 W. Lafayette Blvd., Room 751

Detroit, Michigan 48226

Re: United States of America v. Bharath Kakireddy, et al. Case No. 19-20026

Dear Judge Drain,

I am writing in reference to Case:19-20026, which involves Bharath Kakireddy, who is being sentenced on his plea to harboring aliens.

I am the cousin of Bharath Kakireddy and I have known him for 20 years. Mr. Kakireddy has lived with with my family for 8 years during his schooling years. Ours is a strict and disciplined family. Me and Mr. Kakireddy have attended the elementary school, middle school and the high school together. I believe that, childhood plays a key role in shaping one's character. Having shared childhood with Mr. Kakireddy, I can certainly say that he is a man of good character, humble, sincere and honest. He was never involved in any wrong doing.

Many international students are unaware of the laws in US and also the authenticity of the universities they are joining. I don't know under which circumstances Mr. Kakireddy was recruiting people to Farmington University, but I am confident that he would never have done this if he was aware of the consequences of his actions. He never did any actions to harm others. From the little knowledge I have about the case, Mr. Kakireddy might have recruited the students to help them keep in status in exchange for the course credits from the Farmington University. I don't think that he has done this with any criminal intent.

Mr. Bharath Kakireddy has arrived in US with big dreams to excel in the software world. He has now realized that he did a serious mistake and regrets joining Farmington Hills University which took a bad turn in his life. Had he joined any other certified college after the cancellation of accreditation of Silicon Valley University, his life would have been prosperous. Mr. Kakireddy is broken with the conditions he is currently in and lost some of the most productive time in his life. Having not met Mr. Kakireddy for the last 5 years accompanied with his current situation in custody has left his parents crippled and devastated. I am very concerned about how the sentence will affect his parents.

Most of my family members in India cannot speak, read or write in English, which is why, I am writing this letter on behalf of all of them. All my family members are praying for Mr. Kakireddy to be deported to India as early as possible. Considering the good character of Mr. Kakireddy, we beg you to consider deporting him. As a large family, we are prepared to rehabilitate Mr. Kakireddy and provide him necessary support to start a new journey in India.

Students are the future of any nation and they deserve a second chance for the mistakes they did with no intent to harm others. I pray that you be lenient with my cousin.

Yours sincerely,

Chakridhar Reddy Teeneti,

Doctoral candidate,

Utah State University.